REMARKS

Claims 1-26 are currently pending in the application. Claims 1, 10, 14 and 22 are independent claims and claims 2-9, 11-13, 15-21, and 23-26, respectively, depend from the independent claims. The Applicants request reconsideration of the claims in light of the following remarks.

On page 2 of the Office Action, claims 1-26 were rejected under 35 U.S.C. § 103(a) as being obvious in view of the proposed combination of Jamtgaard et al. US Patent 6,430,624 B1 (Jamtgaard) and Sugiarto et al. US Patent 6,278,449 (Sugiarto). Applicants respectfully traverse the rejections for at least the following reasons.

After careful review of the rejections in the instant Office Action, Applicants submit that the rejections lack specificity, that is the Office Action fails to particularly indicate where in the cited references that a suggested teaching can be found. Applicants submit that merely suggesting a teaching exists in all 67 lines in a particular column or within the four corners of a figure in a cited reference is inadequate to provide sufficient indication of where exactly the Examiner believes a particular teaching lies. This lack of specificity in making rejections results in making the Applicants' task of responding to the rejections very difficult. Therefore, because the rejections in the instant Office Action lack specificity, the Applicants request that the next Office Action be made non-final and any rejections be made more specific in order that the Applicants may be provided with at least a fair opportunity to respond to the rejections.

According to the Office Action, Sugiarto discloses all of the features of Applicants' claim 1 except a rule generator for generating a set of transformation rules for transforming source content into result content according to selective placement. Applicants agree that Sugiarto at

2

least fails to disclose the above-mentioned feature, however Applicants assert that Sugiarto also fails to disclose additional features set forth in independent claim 1.

Specifically, Applicants assert that Sugiarto at least also fails to disclose the following features which are set forth in claim 1:

an analyzer for identifying separate elements within a source content and assigning an identifier to each element; and

an application device for applying the transformation rules to the source content that is requested by the content receiving device.

In contrast to the analyzer disclosed in the Applicants' claimed invention, Sugiarto merely discloses user-generated configuration files stored in a server and specifying what information a user would like to retrieve and how the information is to be formatted (col. 4, lines 12-19). Sugiarto fails to disclose an analyzer as set forth in Applicants' claim 1. Additionally, Sugiarto fails to disclose any element performing the functions of identifying separate elements within a source content and assigning an identifier to each element. Applicants respectfully assert that Sugiarto at least fails to disclose the features recited above as set forth in Applicants' independent claim 1.

In further contrast to the Applicants' claimed invention, and as admitted in the Office Action, Sugiarto fails to disclose a rule generator for generating a set of transformation rules for transforming source content into result content. Applicants assert that because Sugiarto fails to disclose the rule generator and thus the set of transformation rules, Sugiarto also fails to disclose the application device for applying the rules. Because Sugiarto fails to disclose generating a set of transformation rules for transforming source content into result content, Applicants assert that

3

Sugiarto is incapable of disclosing a device for applying the generated transformation rules to the source content.

Because Sugiarto fails to disclose at least the above recited features set forth in independent claim 1, Applicants assert that claim 1 is therefore allowable over Sugiarto.

Jamtgaard fails to remedy the deficiencies of Sugiarto. Jamtgaard, even if combined with Sugiarto, at least fails to disclose an analyzer for identifying separate elements within a source content and assigning an identifier to each element. Jamtgaard, in contrast to the Applicants' claimed analyzer, discloses an intelligent harvester to intelligently grab user specific content from a site (col. 5, lines 29-40). Jamtgaard does not disclose any device which identifies separate elements within source content and assigns an identifier to the elements.

Because Sugiarto and Jamtgaard, alone or in combination, fail to disclose every feature set forth in Applicants' independent claim 1, Applicants assert that claim 1 is allowable over the proposed combination of references. The Applicants request that the rejection of claim 1 over the proposed combination be withdrawn.

Claims 2-9 were also rejected as being obvious over the proposed combination of Sugiarto and Jamtgaard. However, in light of the above recited deficiencies of the proposed references, alone or combined, with respect to claim 1, Applicants assert that rejection of claims 2-9 are now moot and that the claims are allowable over the cited references. The Applicants request that the rejection of claims 2-9 be withdrawn.

Regarding claim 10, in the last two lines of page 4, the Office Action suggests that claim 10 differs from claim 1 in that "a web page editor running on the at least one design station, whereby a source web page is retrieved and the layout of a result web page is formed according to the different device capabilities: and a rule generator associated with the web page editor for

4

generating a set of transform rules to convert the source page to the result page, the transform rules being communicated to the at least one proxy server device, wherein the web enabled devices request information from the at least one web site through the at least one proxy server which applies the transform rules to the requested information" which the Office Action suggests reads on Jamtgaard (see col. 14, lines 4-67 and figures 2-3). Applicants respectfully disagree that claim 10 differs from claim 1 merely by the features suggested in the Office Action and asserts that claim 10 should be interpreted based upon its own disclosed features. However, in response to the proposed rejection of claim 10, Applicants assert that because the proposed combination fails to disclose every element set forth in Applicants' claim 1 (see remarks above), then claim 10, which recites additional and different features beyond those recited in claim 1, is also allowable over the proposed combination of references.

Further, Applicants submit that claim 10 is also different from the proposed combination of references for at least the following reasons. Claim 10 discloses, among other features, at least one proxy server and at least one design station in communication with the at least one proxy server, wherein web enabled devices request information from at least one web site through the at least one proxy server which applies the transform rules to the requested information.

In contrast, Jamtgaard discloses a translation server allowing content providers to deliver their content (in different formats) to one or more different information appliances without needing to reformat, re-author or rebuild an existing website in order to deliver it to the different information appliances using different communications formats. Applicants respectfully assert that Jamtgaard teaches away from the Applicants' claimed invention because Jamtgaard teaches a translation server allowing delivery of content without needing reformatting, etc. whereas the

Applicants set forth at least one proxy server which applies the transform rules to the requested information (i.e., content). Thus, Jamtgaard teaches away from the Applicants' claimed invention.

Further, Jamtgaard fails to disclose the recited structures for performing a transformation rule application, i.e., a design station in communication with a proxy server wherein information requests are applied through the proxy server and the proxy server applies the transform rules to the requested information (i.e., content).

For at least the reasons presented above, Applicants assert that Jamtgaard and Sugiarto, either alone or in combination, fail to disclose each and every feature set forth in independent claim 10. Claim 10 is therefore allowable over the proposed combination of references and Applicants request that the rejection of claim 10 be withdrawn.

Claims 11-13 were also rejected as being obvious over the proposed combination of Sugiarto and Jamtgaard. However, in light of the above recited deficiencies of the proposed combination of references with respect to claim 10, Applicants assert that rejection of claims 11-13 are now moot and that the claims are allowable over the cited references. The Applicants request that the rejection of claims 11-13 be withdrawn.

Regarding claim 14, in the paragraph in the middle of page 5, the Office Action suggests that claim 14 merely differs from claims 1 and 10 in that "a first display area for displaying the source content; a second display are for displaying the result content, a set of graphical tools whereby the source content can be graphically moved with the tools from the first are to the second area to form a result layout" which the Office Action suggests reads on Jamtgaard (see col. 17, lines 22-67 and col. 18, lines 1-40). Applicants respectfully disagree that claim 14 differs from claims 1 and 10 merely by the features suggested in the Office Action and asserts

6

that instead claim 14 should be interpreted based upon its own disclosed features. However, in response to the proposed rejection of claim 14, Applicants assert that because the proposed combination fails to disclose every element set forth in Applicants' claims 1 and 10 (see remarks above), then claim 14, which recites additional and different features beyond those recited in claims 1 and 10, is also allowable over the proposed combination of references.

Further, Applicants submit that claim 14 is also different from the proposed combination of references for at least the following reasons. Claim 14 discloses, among other features, at least a rule generator for generating a set of transformation rules, the rules being formed according to a set of graphical tools.

In contrast to the Applicants' claimed invention, Jamtgaard discloses a layout engine iterating through a relational tree structure building cards for an appropriate screen size for a target device (col. 17, lines 54-57). Jamtgaard is different than the Applicants' claimed invention because Jamtgaard discloses a layout engine whereas the Applicants set forth a rule generator. Further, Jamtgaard discloses iterating through a relational tree structure whereas the Applicants set forth generating a set of transformation rules. Additionally, Jamtgaard discloses building cards for an appropriate screen size for a target device whereas Applicants set forth forming rules according to a set of graphical tools. Jamtgaard fails to at least disclose the above recited features in Applicants' claim 14. The Office Action has failed to suggest any similarities between Sugiarto and the features recited in Applicants' claim 14.

For at least the reasons presented above, Applicants assert that Jamtgaard and Sugiarto, either alone or in combination, fail to disclose each and every feature set forth in independent claim 14. Claim 14 is therefore allowable over the proposed combination of references and Applicants request that the rejection of claim 14 be withdrawn.

Claims 15-21 were also rejected as being obvious over the proposed combination of Sugiarto and Jamtgaard. However, in light of the above recited deficiencies of the proposed combination of references with respect to claim 14, Applicants assert that rejection of claims 15-21 are now moot and that the claims are allowable over the cited references. The Applicants request that the rejection of claims 15-21 be withdrawn.

Regarding claim 22, in the paragraph at the bottom of page 5, the Office Action suggests that claim 22 merely differs from claims 1, 10 and 14 in that "arranging result information content from the source information content according to the capabilities of the receiving device; generating transformation rules according to the transformation between the source information content and the result information content; and applying the appropriate transformation rules to the source information content when the content is requested by the receiving device" which is the Office Action suggests is disclosed in Jamtgaard (see Figs. 4-6). Applicants respectfully disagree that claim 22 differs from claims 1, 10, and 14 merely by the features suggested in the Office Action and asserts that instead claim 22 should be interpreted based upon its own disclosed features. However, in response to the proposed rejection of claim 22, Applicants assert that because the proposed combination fails to disclose every element set forth in Applicants' claims 1, 10, and 14 (see remarks above), then claim 22, which recites additional features beyond those recited in claims 1, 10, and 14, is also allowable over the proposed combination of references.

Further, Applicants submit that claim 22 is also different from the proposed combination of references for at least the following reasons. Claim 22 discloses, among other features, at least generating transformation rules and applying the transformation rules to the source information content when the content is requested by the receiving device.

8

In contrast to the Applicants' claimed invention, Jamtgaard discloses a translation server that may include a database that may include XSL rules used by the XML engine for converting XHTML pages into RML, one or more URL Ids and various device information whereas the Applicants set forth generating transformation rules and applying the transformation rules to the source information content when the content is requested by the receiving device. Therefore, Jamtgaard is different than the invention set forth in Applicants' independent claim 22. Jamtgaard fails to at least disclose the above recited features in Applicants' claim 22. The Office Action has failed to suggest any similarities between Sugiarto and the features recited in Applicants' claim 22.

For at least the reasons presented above, Applicants assert that Jamtgaard and Sugiarto, either alone or in combination, fail to disclose each and every feature set forth in independent claim 22. Claim 22 is therefore allowable over the proposed combination of references and Applicants request that the rejection of claim 22 be withdrawn.

Claims 23-26 were also rejected as being obvious over the proposed combination of Sugiarto and Jamtgaard. However, in light of the above recited deficiencies of the proposed combination of references with respect to claim 22, Applicants assert that the rejection of claims 23-26 is now moot and that the claims are allowable over the cited references. The Applicants request that the rejection of claim 23-26 be withdrawn.
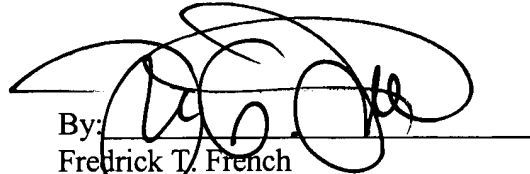
Based on at least the foregoing, Applicants respectfully submit the cited references, alone or in the proposed combination, fail to disclose the features of Applicants' claimed invention. For at least these reasons, Applicants submit that claims 1-26 are in condition for allowance and requests that the application be passed to issue.

Should the Examiner disagree or have any questions regarding this submission, Applicants invite the Examiner to telephone the undersigned at (312) 775-8000.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

Dated: October 8, 2003

By: _____
Fredrick T. French
Reg. No. 52,524

McAndrews, Held & Malloy, Ltd.
500 West Madison Street - Ste. 3400
Chicago, Illinois 60661
(312) 775-8000